

United States Courts
Southern District of Texas
FILED

NOV 08 2014

A091 (Rev. 8/01) Criminal Complaint

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

V.

Ragina BALDERAS

CRIMINAL COMPLAINT

Case Number:

C-14-1201m

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about 11/7/2014 in Brooks County, in the

(Date)

Southern District of Texas defendant, Ragina BALDERAS

did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law,

in violation of Title 8 United States Code, Section(s) 1324.
I further state that I am a(n) Special Agent and that this complaint is based on the following facts:
Official Title

See Attached Affidavit of ICE Special Agent

Brian Johnson

Continued on the attached sheet and made a part of this complaint:

☒

Yes

☐

No

Signature of Complainant

Brian Johnson

Printed Name of Complainant

Sworn to before me and signed in my presence, and probable cause found

November 8, 2014

Date

at

Corpus Christi, Texas

City and State

Jason B. Libby U.S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

ATTACHMENT

On November 7, 2014, Border Patrol agents assigned to the Border Patrol checkpoint located near Falfurrias, Texas encountered Ragina BALDERAS as the vehicle she was driving approached the inspection area. Also in the vehicle was an individual later identified as a fifteen-year-old juvenile who will be referred to as Jane Doe. Upon questioning, BALDERAS stated she is a United States citizen and she and the juvenile passenger were traveling to Houston, Texas. BALDERAS further stated the passenger was her sister-in-law and provided a United States birth certificate with the name "Jaksary Lee Sanchez." BALDERAS indicated the birth certificate belonged to Doe. Doe woke up and was questioned by Border Patrol agents but appeared confused and did not answer. Border Patrol agents noted both individuals appeared nervous and BALDERAS was directed to the secondary inspection area.

Once in the secondary inspection area, Border Patrol agents questioned the juvenile further at which point she admitted she is a citizen of Mexico illegally present in the United States. Border Patrol agents further determined Doe is not the individual who's birth certificate BALDERAS presented as identification. Border Patrol agents continued to question BALDERAS separately in the secondary inspection area and she continued to claim Doe is her sister-in-law. During the questioning, BALDERAS became frustrated and exclaimed, "I can't believe this is happening again." Border Patrol agents asked BALDERAS to clarify her statement at which point she admitted she was previously arrested for alien smuggling. Both individuals were placed under arrest and taken inside the checkpoint office for further questioning.

Once inside the checkpoint office, BALDERAS requested an attorney and no further questions were asked. Border Patrol read informed Doe of her Miranda Rights and she indicated she understood those rights by signing an advisement of rights document. Doe told Border Patrol agents her parents made arrangements in Mexico for her to be smuggled into the United States and she entered the United States illegally by crossing the Rio Grande River. Doe was taken to an unknown house where she stayed for approximately six days. Doe was then taken driven by an unknown man to a location where they met a woman she knew as "Ragina." Ragina instructed Doe to get in the vehicle and further instructed Doe to say her name was "Jaksary" and she is from McAllen if questioned. BALDERAS further instructed Doe to act as if she was sleeping when they approached the Border Patrol checkpoint.

Further records checks revealed BALDERAS is currently on supervised release following an alien smuggling conviction in McAllen, Texas.